

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE 1–4,

Plaintiffs,

v.

RED ROOF INNS, INC., et al.

Defendant,

CIVIL ACTION FILE

NO. 1:21-cv-04278-WMR

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

W.K., E.H., M.M., R.P., M.B., D.P., A.F.,
C.A., R.K., K.P., and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC., FMW RRI NC,
LLC, RED ROOF FRANCHISING, LLC,
RRI WEST MANAGEMENT, LLC,
VARAHI HOTEL, LLC, WESTMONT
HOSPITALITY GROUP, INC., and RRI
III, LLC,

Defendants.

CIVIL ACTION FILE

NO. 1:20-cv-5263-VMC

JURY TRIAL DEMANDED

Pursuant to Fed. R. Civ. P. 38

PLAINTIFFS' NOTICE OF FILING
SUMMARY JUDGMENT EXHIBITS 26-51

Plaintiffs file this Notice of Filing Summary Judgment Exhibits 26–51 to assist the Court in its review of the evidence that Plaintiffs cite in responding to Defendants’ summary judgment motions. Defendants filed multiple, separate summary judgment motions, each with a separate statement of facts that the Defendants contend are both material and undisputed. To streamline the Court’s review of these motions and the Plaintiffs’ responses, Plaintiffs are filing one consolidated response brief. And pursuant to Local Rule 56.1(B)(2) Plaintiffs are also filing individual responses to each statement of facts as well as Plaintiffs’ own statement of additional facts which Plaintiffs contends are material and present a genuine issue for trial.

In all of Plaintiffs’ responsive filings, Plaintiffs refer to the evidence in the record that is attached to this Notice and listed below by exhibit numbers. Where Plaintiffs cite to these exhibits in their filings, they do so with reference to these exhibit numbers, which will mostly be found in parentheticals along with the specific record citation (*e.g.*, JD21 Dep. (**Ex. 1**) 153:3-7).

In addition, many of the exhibits listed below contain either confidential information or information that Defendants have designated confidential. As noted below, here Plaintiffs file only the redacted versions of such documents or—where the Defendants have marked the whole document confidential—a document

#3516846v1

placeholder. Consistent with the Local Rules, Plaintiffs are separately filing a motion to seal the unredacted, full copies of any such documents and are provisionally filing those documents under seal.

Finally, because of technical restrictions, Plaintiffs are filing these exhibits in batches and noting in the title of each Notice the range of Exhibits included in that batch.

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
1	6/9/2022	JD1 Vol. 1 Deposition Excerpts		Redacted (Plaintiffs)
2	6/10/2022	JD1 Vol. 2 Deposition Excerpts		Redacted (Plaintiffs)
3	6/16/2022	JD2 Vol. 1 Deposition Excerpts		Redacted (Plaintiffs)
4	8/29/2022	JD2 Vol. 2 Deposition Excerpts		Redacted (Plaintiffs)
5	4/13/2022	JD3 Deposition Excerpts		Redacted (Plaintiffs)
6	6/24/2022	JD4 Deposition Excerpts		Redacted (Plaintiffs)
7	6/30/2022	DP Deposition Excerpts		Redacted (Plaintiffs)
8	10/12/2022	EH Deposition Excerpts		Redacted (Plaintiffs)
9	3/22/2022	MB Deposition Excerpts		Redacted (Plaintiffs)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
10	4/14/2022	RP Deposition Excerpts		Redacted (Plaintiffs)
11	11/4/2021	WK Deposition Excerpts		Redacted (Plaintiffs)
12	9/30/2022	Varahi 30(b)(6) Deposition Excerpts		Redacted (Defendants)
13		INTENTIONALLY LEFT BLANK		N/A
14	2/2/2022	Michael Thomas Deposition Excerpts		None
15	10/18/2021	Vanessa Cole Deposition Excerpts		None
16	7/14/2022	KP Deposition Excerpts		Redacted (Plaintiffs)
17	5/25/2022	Bharat Patel Deposition Excerpts		Redacted (Defendants)
18	3/18/2022	James “Jay” Moyer Deposition Excerpts		Redacted (Defendants)
19	10/22/2021	Forrest Castille Deposition Excerpts		Redacted (Plaintiffs)
20	3/3/2022	CA Vol. 1 Deposition Excerpts		Redacted (Plaintiffs)
21	8/12/2022	CA Vol. 2 Deposition Excerpts		Redacted (Plaintiffs)
22	5/6/2022	RK Deposition Excerpts		Redacted (Plaintiffs)
23	5/5/2022	TH Deposition Excerpts		Redacted (Plaintiffs)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
24	8/31/2022	AF Deposition Excerpts		Redacted (Plaintiffs)
25	11/11/2021	MM Deposition Excerpts		Redacted (Plaintiffs)
26	5/11/2022	Greg Stocker 30(b)(6) Vol. 1 Deposition Excerpts		None
27		INTENTIONALLY LEFT BLANK		N/A
28	5/11/2022	Greg Stocker Individual Deposition Excerpts		None
29	10/20/2021	Michelle Sarkisian Deposition Excerpts		None
30	6/27/2022	Andrew Alexander Deposition Excerpts		None
31	4/27/2022	George Limbert Vol. 1 Deposition Excerpts		Redacted (Defendants)
32		INTENTIONALLY LEFT BLANK		N/A
33	5/17/2022	Westmont Hospitality Group, Inc. 30(b)(6) (Brianne Austin) Deposition Excerpts		None
34	8/25/2022	RRI 30(b)(6) (John Park) Deposition Excerpts		Redacted (Defendants)
35	3/11/2022	Vickie Lam Deposition Excerpts		Redacted (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
36	6/14/2022	Marina MacDonald Deposition Excerpts		None
37		INTENTIONALLY LEFT BLANK		N/A
38	9/14/2022	KP ESA Deposition Excerpts		Redacted (Plaintiffs)
39	11/10/2022	CA ESA Deposition Excerpts		Redacted (Plaintiffs)
40	5/20/2022	Brenda Connor Deposition Excerpts		Redacted (Plaintiffs)
41	1/19/2022	Monica Hamilton Deposition Excerpts		None
42	8/9/2022	RRI 30(b)(6) Michelle Wehrle Deposition Excerpts		None
43	5/3/2022	Vince Vittatoe Deposition Excerpts		Redacted (Defendants)
44	7/6/2022	Tom McElroy Deposition Excerpts		None
45		INTENTIONALLY LEFT BLANK		N/A
46		INTENTIONALLY LEFT BLANK		N/A
47		INTENTIONALLY LEFT BLANK		N/A
48		Plaintiffs' Claims Chart		None
49		Plaintiffs' Trafficking Chart		None
50		Cast of Characters Chart		None

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
51		Defendants' Roles Chart		None
52		RRI-FMC Structure Chart	WRRH 000235	Confidential (Defendants)
53		Red Roof Inns, Inc. Structure Chart	WRRH 000236	Confidential (Defendants)
54		RRI Dune Structure Chart	WRRH 000234	Confidential (Defendants)
55	5/8/2013	DeKalb County Police Department Incident Report	Pltf.-RRI0006326- Pltf.-RRI0006325	None
56	9/20/2013	Brookhaven Police Department Incident Report	Pltf.-RRI0000124- Pltf.-RRI0000127	None
57	10/24/2013	Brookhaven Police Department Incident Report	Pltf.-RRI0000167- Pltf.-RRI0000173	None
58	5/3/2014	Brookhaven Police Department Incident Report	Pltf.-RRI0000303- Pltf.-RRI0000306	None
59	11/24/2015	Brookhaven Police Department Incident Report	Pltf.-RRI0000630- Pltf.-RRI0000640	None
60	4/10/2016	Brookhaven Police Department Incident Report	Pltf.-RRI0000776- Pltf.-RRI0000784	None
61	2/27/2017	Cobb County Police Incident Report	Pltf.-RRI0003810- Pltf.-RRI00003816	None
62	11/7/2022	DeKalb County Police Department Incident Report	Pltf.-RRI0005238- Pltf.-RRI0005239	None

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
63	11/7/2011	DeKalb County Police Department Incident Report	Pltf-RR10006294- Pltf-RR10006295	None
64	12/7/2014	Cobb County Police Case Supplemental Report	Pltf. W.K.-000386 - Pltf. W.K.-000387	None
65	8/23/2019	Affidavit of Vanessa Cole	Pltf-RR10005117- Pltf-RR10005119	None
66	8/29/2019	Affidavit of Michele Sarkisian	Pltf-RR10006217- Pltf-RR10006221	None
67	4/18/2022	Affidavit of Brenda Connor	Pltf-RR10006900- Pltf-RR10006906	Redacted (Plaintiffs)
68	3/1/2023	Declaration of WK		Redacted (Plaintiffs)
69	8/20/2021	Plaintiff W.K.'s Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (excerpts)		Redacted (Plaintiffs)
70	8/23/2021	Plaintiff C.A.'s Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (excerpts)		Redacted (Plaintiffs)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
71	8/23/2021	Plaintiff D.P.'s Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (exc erpts)		Redacted (Plaintiffs)
72	3/23/2020	Plaintiff Jane Doe 2's Objections and Responses to Red Roof Inns, Inc.'s First Interrogatories (exc erpts)		None
73	6/8/2022	Plaintiff Jane Doe 2's Amended and Supplemental Objections and Responses to Defendant Red Roof Inns, Inc.'s Interrogatories (exce rpts)		Redacted (Plaintiffs)
74	8/30/2021	Plaintiff E.H.'s Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (exc erpts)		Redacted (Plaintiffs)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
75	8/10/2022	Plaintiff E.H.'s Amended and Supplemental Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (exc erpts)		Redacted (Plaintiffs)
76	8/23/2001	Plaintiff R.K.'s Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (exc erpts)		None
77	8/23/2021	Plaintiff K.P.'s Amended and Supplemental Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (excerpts)		Redacted (Plaintiffs)
78	8/23/2021	Plaintiff M.M.'s Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (exc erpts)		Redacted (Plaintiffs)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
79	3/23/2020	Plaintiff Jane Doe 4's Amended and Supplemental Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (excerpts)		Redacted (Plaintiffs)
80	8/30/2021	Plaintiff R.P.'s Amended and Supplemental Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (excerpts)		Redacted (Plaintiffs)
81	3/23/2020	Plaintiff Jane Doe 3's Objections and Responses to Defendant Red Roof Inns, Inc.'s First Interrogatories (excerpts)		Redacted (Plaintiffs)
82	11/12/2013	Email Re: 2014 Budget	RRI WK 00004955	None
83	5/8/2012	Email Re: Calfee Report on Ohio Government: February 2012	RRI_WK_00005964- RRI WK 00005965	Confidential (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
84	7/24/2012	Email Re: Did We Stay At The Seacucus RRI???	RRI_WK_00020959- RRI_WK_00020963	Confidential (Defendants)
85	7/26/2012	Email Re: Travel Risk Management Conference: Focusing on Corporate & Government Travel	RRI_WK_00020970- RRI_WK_00020973	Confidential (Defendants)
86	8/20/2012	Email Re: Today's Clips	RRI_WK_00034394- RRI_WK_0034397	Confidential (Defendants)
87	3/30/2012	Email Re: e-Pak 3.30.2012	RRI_WK_00038055- RRI_WK_0038077	Confidential (Defendants)
88	4/18/2017	Email Re: FW: legal notice – RRI #88 Smyrna, GA	RRI_WK_00045856- RRI_WK_00045864	Confidential (Defendants)
89	8/9/2017	Email Re: RRI #88 Smyrna, GA – Officer Jeffrey Adcock (Abatement Concerns)	RRI_WK_00045963	Confidential (Defendants)
90	11/16/2015	Email Re: RRI Crisis Monitoring Monthly Report- July to October, 2015	RRI_WK_000050250 & RRI_WK_00050252- RRI_WK_00050260 & RRI_WK_00050251	Confidential (Defendants)
91	8/10/2017	Email Re: Red Roof- 2200 Corporate Plaza	RRI_WK_00002998- RRI_WK_00003007	None

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
92	11/13/2015	Email Re: Crisis Monitoring Monthly Report- July to October, 2015	RRI_WK_00005242- RRI_WK_00005251	None
93	10/22/2012	Email re: Druid Hills Buckhead #130	RRI_WK_00004883- RRI_WK_00004886	None
94	9/18/2017	Email Re: Employee Meeting Notes – Red Roof Inn Smyrna	RRI_WK_00003033- RRI_WK_00003036	None
95	11/12/2013	Email re: 2014 Budget	RRI_WK_00004955	None
96	12/23/2019	Email re 2019 Bonus	RRI_WK_00024042- RRI_WK_00024045	Confidential (Defendants)
97	4/16/2013	Email re April- Mid Month NR	WHM_WK_000804	Confidential (Defendants)
98	10/18/2013	Email re Mid-Month NR- October	RRI_WK_00002480- RRI_WK_00002482	Confidential (Defendants)
99	11/30/2018	Email re RRI Audit Report	RRI_WK_00043604	Confidential (Defendants)
100	2/19/2012	Email re Google Alert- Red Roof Inns	RRI_WK_00006026- RRI_WK_00006028	Confidential (Defendants)
101	8/28/2012	Email re St. Louis- Forest Park Notice	RRI_WK_00050890- RRI_WK_00050893	Confidential (Defendants)
102	8/2/2013	Email re RRI Framingham	RRI_WK_00043387- RRI_WK_00043388	Confidential (Defendants)
103	2/21/2012	Email re Google Alert- Red Roof Inn	RRI_WK_00050866- RRI_WK_00050867	Confidential (Defendants)
104	2/2/2017	Email re Region 4 Security	RRI_WK_00022358- RRI_WK_0002362	Confidential (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
105	4/30/2014	Email re Google Alert- Red Roof Inn	WHM_WK_000067	Confidential (Defendants)
106	11/14/2014	Email re Google Alert- Red Roof Inn	WHM_WK_000071	Confidential (Defendants)
107	1/15/2015	Email re Google Alert- Red Roof Inn	WHM_WK_000073	Confidential (Defendants)
108	3/26/2015	Email re Google Alert- Red Roof Inn	WHM_WK_000122	Confidential (Defendants)
109	9/23/2015	Email re Google Alert- Red Roof Inn	RRI_WK_00045005- RRI_WK_00045506	Confidential (Defendants)
110	11/12/2013	Email Re: Notes for Budget Reviews FMC and Dune	RRI_EF_00007425- RRI_EF_00007426	Confidential (Defendants)
111	4/29/2014	Email Re: Prostitutes	RRI_WK_00004225	None
112	2/16/2012	Email Re: Red Roof January 2012 Monthly Activities Report	RRI_WK_00005968	Confidential (Defendants)
113	9/16/2016	Email re; Kyle Miller	RRI_WK_00005021- RRI_WK_00005055	None
114	11/27/2012	Email re RRI Smyrna Satisfaction Survey Results	RRI_WK_00004900- RRI_WK_00004901	None
115	9/24/2014	Email re Red Roof Inn Daily Summary	RRI_WK_00002545- RRI_WK_00002557	None
116	2/15/2012	Email Re: OH&LA: Recap of Columbus Meeting 2.9.12	RRI_WK_00005966- RRI_WK_00005967	Confidential (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
117	4/26/2015	Email Re: Red Roof Plus+ Atlanta - Buckhead Complaint of Guest at Property	RRI_WK_00004957- RRI_WK_00004958	None
118	8/17/2015	Email Re: Prostitutes IO130	RRI_WK_00004873- RRI_WK_00004872	None
119	3/19/2015	Copy of Negative Case Extract-Last Month - 03-31-2015 (Excerpt)	RRI_WK_00000084	Confidential (Defendants)
120	3/21/2012	Email re D11 Negative Comments with excerpt	RRI_WK_00004862- RRI_WK_00004866	None
121	4/15/2016	Email Re: Service Manager Task Assigned- Tracey Strickland	RRI_WK_00004295- RRI_WK_00004296	None
122	5/6/2015	RRI Crisis Monitoring Top Properties May-December 2015 (Extract)	RRI_WK_00002843	None
123	6/5/2017	RRI Smyrna Satisfacton Survey Results	RRI_WK_00000419- RRI_WK_00000421	Confidential (Defendants)
124	1/18/2012	Email re 1-11-12 Ronald Roebuck-Katherine Hampton	RRI_WK_00048239	Confidential (Defendants)
125	10/4/2013	Email re Red Roof Weekly Report, September 30-October 4	RRI_WK_00013148- RRI_WK_00013152	Confidential (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
126	10/10/2013	Email re Today's Clips	RRI_WK_00013153- RRI_WK_00013155	Confidential (Defendants)
127	4/30/2014	Email re Google Alert- Red Roof Inn	RRI_WK_00013667	Confidential (Defendants)
128	6/25/2014	Email re Today's Clips	RRI_WK_00012069- RRI_WK_00012070	Confidential (Defendants)
129	10/21/2015	Email re Today's Clips	RRI_WK_00015681- RRI_WK_00015682	Confidential (Defendants)
130	1/22/2016	Email re Red Roof Weekly Report January 18-January 22, 2016	RRI_WK_00015980- RRI_WK_00015988	Confidential (Defendants)
131	5/6/2016	Email re Today's Clips	RRI_WK_00018256	Confidential (Defendants)
132	1/18/2017	Email re Red Roof Weekly Report January 9-January 13, 2017	RRI_WK_00065393- RRI_WK_00065402	Confidential (Defendants)
133	7/25/2018	Email re Today's Clips	RRI_WK_00035221- RRI_WK_00035224	Confidential (Defendants)
134	11/16/2014	Email re Google Alert- Red Roof Inn	RRI_WK_00014215	Confidential (Defendants)
135	8/25/2016	Email re Google Alert- Red Roof Inn	RRI_WK_00016329	Confidential (Defendants)
136	12/30/2016	Email re Google Alert- Red Roof Inn	RRI_WK_00065387- RRI_WK_00065388	Confidential (Defendants)
137	1/30/2018	Email re Google Alert- Red Roof Inn	RRI_WK_00035083- RRI_WK_00035084	Confidential (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
138	12/30/2015	Email Re: Red Roof Guest Relations Case Created for Scoot Ernster	RRI_WK_00004982- RRI_WK_00004986	None
139	9/6/2022	Expert Report of Anique Whitmore		Confidential (Plaintiffs)
140	9/6/2022	Expert Report of Alan L. Tallis		Confidential (Plaintiffs)
141	8/22/2018	Fireman's Fund Insurance Company Policy Divider, Westmont Hospitality Group, Inc.	RRI_001606- RRI_002263	Confidential (Defendants)
142	8/22/2018	Fireman's Fund Insurance Company Policy Divider, Westmont Hospitality Group, Inc.	RRI_002264- RRI_002491	Confidential (Defendants)
143		JD3 Dep. Exhibit 19		Confidential (Plaintiffs)
144		JD2 Dep. Exhibit 20		Confidential (Plaintiffs)
145	2/3/2023	PIVIP Business Registration	N/A	None
146		Red Roof Inns's "Preventing & Reacting to Child Sex Trafficking	RRI 000466- RRI 000497	Confidential (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
147		LP6 – VPO Comments and Assets – District 1	RRI_WK_00002388- RRI_WK_00002475	None
148	2/1/2012	Hotel & Lodging Executive Briefing	RRI_WK_00050853- RRI_WK_00050857	Confidential (Defendants)
149	6/1/2012	Red Roof Inn GSR InnSider	RRI_WK_00011859- RRI_WK_00011903	Confidential (Defendants)
150	4/1/2013	Top Clips Report: April 2013 Hill + Knowlton Strategies	RRI_WK_00012850- RRI_WK_00012872	Confidential (Defendants)
151		2015 Crisis Monitoring Report May – December, 2015	RRI_WK_00002844- RRI_WK_00002854	None
152	1/28/2016	Do Not Rent List	RRI_WK_00000548- RRI_WK_00000609	Confidential (Defendants)
153	9/5/2017	Red Roof Inn Public Safety Nuisance Abatement Meeting	Pltf-RRI0002284- Pltf-RRI0002285	None
154	10/6/2017	Red Roof Weekly Report, October 2- October 6, 2017	RRI_WK_00035014- RRI_WK_00035030	Confidential (Defendants)
155		Texas Franchise Tax Public Information Report	Limbert 184	None
156	4/1/2020	Red Roof Franchising, LLC Disclosure Document	RRI_WK_00042263- RRI_WK_00042569	Confidential (Defendants)
157	3/2/2015	Confidential Ownership Information	Pltf-RRI-0010181	Confidential (Defendants)

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
158	1/13/2014	Minutes of Annual Meeting of the Sole Shareholder of Red Roof Inns, Inc.	RRI_Unredacted 002741- RRI_Unredacted 002753	Confidential (Defendants)
159	1/20/2015	Minutes of Annual Meeting of Sole Shareholder of Red Roof Inns, Inc., RRF Canada, Inc. And RRI Financial, Inc.	RRI_Unredacted 002705- RRI_Unredacted 002740	Confidential (Defendants)
160	1/26/2017	Ops Call Composite		Confidential (Defendants)
161	3/2/2011	Exclusive Property Management Agreement Hospitality Property Red Roof Inn- North Druid Hills	RRI 001103- RRI 001411	Confidential (Defendants)
162	8/25/2011	Property Management Agreement between FMW RRI NC LLC and RRI West Management, LLC	RRI 000991- RRI 001102 (Redacted)	Confidential (Defendants)
163	3/10/2011	Security Services Agreement	RRI 000809- RRI 000821	Confidential (Defendants)
164	4/1/2020	HomeTowne Studios by Red Roof Franchise Disclosure Document	RRI_WK_00042036- RRI_WK_00042262	Confidential (Defendants)
165	8/30/2007	Amended and Restated Agreement	Westmont 002497- Westmont 002724	Confidential (Defendants)

#3516846v1

Ex.	Date	Description	Bates No.	Redacted or Fully Confidential
166	4/20/2022	Plaintiffs' 30(B)(6) Notice of Deposition of Westmont Hospitality Group, Inc., Westmont Investments LLC, and WRRH Investments LP		None
167	3/1/2012	Red Roof Inn Franchise Agreement by and Between Red Roof Franchising, LLC and Varahi Hotel, LLC	RRI_Unredacted 001423- RRI_Unredacted 001476	Confidential (Defendants)
168		Preventing and Reacting to Child Sex Trafficking Powerpoint	RRI_WK_00001150- RRI_WK_00001181	Confidential (Defendants)
169	12/1/2014	Franchise Operations December 2014 Executive Summary	WHM_WK_000076- WHM_WK_000114	Confidential (Defendants)
170	8/25/2011	Property Management Agreement between FMW RRI NC LLC and RRI West Management, LLC	RRI unredacted 000991- RRI unredacted 001102	Confidential (Defendants)
171	3/12/2017	2016 Performance Evaluation Robert Allen	RRI 000117- RRI 000119	Confidential (Defendants)

Signature follows on the next page.

Respectfully submitted this 2nd day of March, 2023.

Jonathan S. Tonge
jtonge@atclawfirm.com
Georgia Bar No. 303999
Patrick J. McDonough
Georgia Bar No. 489855
pmcdonough@atclawfirm.com

ANDERSEN, TATE & CARR, P.C.
One Sugarloaf Centre
1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
(770) 822-0900 – Telephone
(770) 822-9680 – Facsimile

/s/Michael R. Baumrind
John E. Floyd
Georgia Bar No. 266413
floyd@bmelaw.com
Tiana S. Mykkeltvedt
Georgia Bar No. 533512
mykkeltvedt@bmelaw.com
Manoj S. Varghese
Georgia Bar No. 734668
varghese@bmelaw.com
Amanda Kay Seals
Georgia Bar No. 502720
seals@bmelaw.com
Michael R. Baumrind
Georgia Bar No. 960296
baumrind@bmelaw.com
Juliana Mesa
Georgia Bar No. 585087
mesa@bmelaw.com

BONDURANT, MIXSON &
ELMORE, LLP
1201 West Peachtree Street, N.W.,
Suite 3900
Atlanta, Georgia 30309
(404) 881-4100 – Telephone
(404) 881-4111 – Facsimile

Attorneys for Plaintiffs

LOCAL RULE 7.1(D) CERTIFICATION

The undersigned counsel certifies that this document has been prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1(C) and does not exceed the page limit imposed by Local Rule 7.1(D).

/s/Michael R. Baumrind
Michael R. Baumrind
Georgia Bar No. 960296

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the within and foregoing **PLAINTIFFS' NOTICE OF FILING SUMMARY JUDGMENT EXHIBITS 26-51** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

This 2nd day of March, 2022.

/s/Michael R. Baumrind
Michael R. Baumrind
Georgia Bar No. 960296